

Date: 20/10/2019

Review: 01

CRIME PREVENTION POLICY

AGREEMENTS

LINDEN COMANSA Group is committed to the following compliance issues:

- To strive for the highest standards of transparency, honesty and responsibility by prohibiting the committing of criminal acts, promoting zero tolerance towards illegal and improper actions within the Organisation.
- To comply with the applicable criminal legislation, respecting the current legislation applicable to the Organisation's scope of action and, specifically, its internal regulations embodied in the Code of Ethics and Conduct.
- To implement a crime prevention model that provides the appropriate framework for regulatory compliance, incorporating criminal compliance objectives that are subject to periodic review.
- To identify the activities within the scope of which the crimes to be prevented through the creation of the appropriate "risk map" for their subsequent identification, analysis and risk assessment.
- To comply with the requirements and commitments of the policy and model for the prevention of crime, implementing the appropriate measures to prevent the commission of illegal acts by establishing monitoring procedures that are accessible to employees, managers and governing bodies, which minimise the organisation's exposure to criminal risks. These measures must be up-to-date and ongoing and must be designed to prevent any person not subject to these controls from being present.
- To enforce the obligation to report suspicious facts or behaviours related to risks, guaranteeing that the informant will not suffer reprisals, encouraging the involvement of the staff in the prevention and detection of illegal acts through training on the subject and promoting the circulation of the "Ethical Communication Channel" as a means of communicating behaviours that may imply criminal risks for the LINDEN COMANSA Group, as well as any conduct contrary to the Code of Ethics and Conduct and to legality in general.
- To continually improve sustainability, adequacy and effectiveness of the criminal compliance policy, and the rest of the criminal compliance management system. I will analyse the information and evaluate it, to use it as a basis to identify opportunities to improve the compliance performance in the company.
- To create a position to coordinate these actions, namely the "Compliance Officer", who will have authority and independence from the governing body.
- To facilitate the actions of the "Compliance Officer", giving him/her the appropriate means and tools necessary to carry out his/her work in the best and most efficient way.
- To react promptly and effectively to a report of an alleged criminal act and to proceed with its investigation respecting the rights of both the complainant and the person(s) being reported and trying to avoid acting in a disproportionate and discriminatory manner when establishing sanctions and any other type of disciplinary measures.
- To bring the alleged crimes to the attention of the competent authorities by offering full cooperation in subsequent investigations that may arise.